

Monsanto

(ADD NAME LOCATION PHONE)

LAW DEPARTMENT

P. S. Park - E2NE

DATE June 11, 1979
SUBJECT Chlorinated Dibenzo Dioxins
REFERENCE G.E.P. Memo 6/11/79
TO G. E. Paget - A2SD

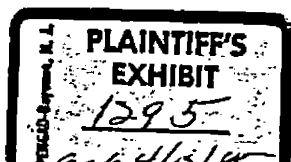
C. F. Callis - B2SA
W. D. Carpenter - C2NA
G. L. Jessee - A2SD
J. P. Mieure - T3B
W. B. Papageorge - G4WA
G. Roush - A2SA
D. Wilson - N3A

CONFIDENTIAL
SUBJECT TO PROTECTIVE ORDER.

Attached to your above referenced memorandum were minutes of our discussion June 8 concerning dioxin monitoring and analytical capabilities. You asked for comments on these minutes. As mentioned at the meeting, I am concerned that Monsanto not over-react as a result of the news media infatuation with dioxin. It is a contaminant in some products, and, in some instances, is highly toxic, but this does not mean that an all-out effort should be made to detect extremely low levels of dioxin in a product after it has been determined that any dioxin present is less than the highest nonhazardous level. Developing unnecessary but inflammatory information might be contrary to the best interests of Monsanto and the public. In any event, my comments are set out below.

1. The last sentence of the paragraph titled "Analytical Position" states that "All present agreed that it was sound policy that Monsanto should be equipped with this level of skill . . .," referring to proposals that would take Monsanto "into the forefront of the field" with respect to determining low tetrachloro dibenzo dioxin isomers levels. I did not agree that this was sound policy, but have reservations as to both the need for maintaining leadership in the field of detecting dioxin at ever-decreasing levels, and the desirability of expending significant resources in such an effort.

I do feel it is important that Monsanto be capable of monitoring products and workplaces for dioxin and any other substance which might be considered hazardous, down to levels at which it is felt no hazard exists. (With respect to products, it is recognized that this determination may vary with use.) I do not feel it is necessary to develop monitoring and analytical capabilities to detect the presence of contaminants at levels below the highest nonhazardous level. I am afraid that disclosure to governmental agencies or the public that a contaminant has been detected in a product at parts per trillion or parts per quadrillion levels (far below the nonhazardous level) will merely add fuel to the media fires, which already burn furiously.

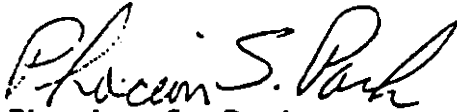


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2. I disagree with the statement that on occasion it will be appropriate to set an upper limit to total dioxin content in effluents and wastes, in the paragraph titled "Effluents and Wastes." Waste products are just that--waste--and must be disposed of, regardless of the dioxin content. Obviously, the presence of more toxic contaminants in waste materials will be a factor in determining the most appropriate method of disposal. However, in my opinion, it would be inappropriate to set a broad upper limit to total dioxin content in waste materials.
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I will be glad to discuss these points with you in greater detail at your convenience.


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